ORIGINAL

LAW OFFICES

LEVENTHAL, SENTER & LERMAN P.L.L.C.

SUITE 600

2000 K STREET, N.W.

WASHINGTON, D.C. 20006-1809 DOCKET FILE COPY ORIGINAL 22 293-778.

TELEPHONE. (202) 429-8970

SENIOR COMMUNICATIONS

CONSULTANT MORTON I. HAMBURG

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

WRITER'S DIRECT DIAL 202-416-6780

WRITER'S E-MAIL DCORBETT@LSL-LAW.COM

July 8, 1997

*ADMITTED CA ONLY

NORMAN P. LEVENTHAL

MEREDITH S. SENTER, JR. STEVEN ALMAN LERMAN RAUL R. RODRIGUEZ DENNIS P. CORBETT

BRIAN M. MADDEN BARBARA K. GARDNER

STEPHEN D. BARUCH

SALLY A. BUCKMAN

DEBORAH R. COLEMAN NANCY A. ORY

NANCY L. WOLF DAVID 5. KEIR

WALTER P. JACOB LINDA D. FELDMANN

RENÉE L. ROLAND

ROSS G. GREENBERG

JOHN D POUTASSE

MATTHEW H. BRENNER*

Office of the Secretary Federal Communications Commission 1919 M Street, N.W. Washington, D.C. 20554

Re:

MM Docket Nos.

91-221

87-8

94-150

92-51/

87-154

Gentlemen/Ladies:

In response to the Commission's public notice dated June 17, 1997, seeking further information regarding television LMAs, Ramar Communications, Inc. and New Mexico Broadcasting Company, Inc., by their attorneys, respectfully submit the following responses to the questions posed in the notice:

(1) For both the brokering and brokered stations, the name of the licensee, call letters, channel number, and community of license.

Licensee (broker*):

New Mexico Broadcasting Company, Inc.

Station KRQE-TV, Channel 13

Albuquerque, NM

Licensee (brokered

station):

Ramar Communications, Inc.

Station KASY-TV, Channel 50

Albuquerque, NM

The broker is Lee Enterprises, Incorporated (Lee), parent company of New Mexico broadcasting Company, Inc.

LEVENTHAL, SENTER & LERMAN PLLC.

Office of the Secretary July 8, 1997 Page 2

(2) The name and rank of the Nielsen Designated Market Area(s) in which the brokering and brokered stations are located.

DMA: Albuquerque, NM

Rank: 48

(3) Whether the brokering and brokered stations have overlapping signal contours and, if so, specify the degree of city grade, grade A or grade B overlap.

Signal contours substantially overlap. The degree of overlap is indicated in the attached Exhibit A

(4) The date on which the parties entered into LMA.

December 12, 1994

(5) Information regarding the term of the LMA - specifically, the start and end dates of the initial term of the LMA, whether the LMA includes renewal provisions, and, if so, the specific terms of such renewal provisions, e.g., length, at which party's option the renewal may be exercised, whether renewal is automatic, notice for exercising renewal option, etc.

Start date:

December 12, 1994.

Expires:

Five years from air date (October 6, 1995), which will be

October 6, 2000.

Renewal:

Five years at broker's option, upon 12 months notice to KASY-TV prior to expiration of the first 5 year term.

(Note: Lee's business plan anticipated a full 10-year LMA in order to recoup initial losses in years 1 to 5. Such losses

are being incurred.)

(6) The percentage of the brokered station's weekly broadcast hours that is brokered to the brokering station.

100% of weekly broadcast advertising time is brokered. Programming is supplied by the broker except for a weekly public affairs program that is produced in cooperation with Ramar.

LEVENTHAL, SENTER & LERMAN P.L.L.C.

Office of the Secretary July 8, 1997 Page 3

(7) Whether the brokering or brokered stations are owned by or affiliated with the ABC, CBS, Fox, NBC, UPN, or WB broadcast television networks. If so, please specify the identity of the network and whether the relationship between network and station is that of ownership or affiliation.

KRQE-TV (broker) is an affiliate of CBS KASY-TV (brokered) is an affiliate of UPN and a secondary affiliate of WB.

(8) The reported Nielsen all-day audience share (measuring 9 a.m. through midnight) for both the brokering and brokered station during the last three most recent rating periods.

HH Ratings	May '97		Feb. '97		Nov. '96	
and Shares	<u>RTG</u>	SHARE	<u>RTG</u>	SHARE	<u>RTG</u>	SHARE
KASY-TV	-	-	1	2	_	_
KRQE-TV*	4	11	3	10	4	11

^{*} Excluding satellite stations.

(9) A brief summary of any other information that parties to an LMA, at their option, may wish to bring to the Commission's attention, such as any efficiencies or public interest benefits they believe have resulted from the LMA, whether the station was off the air prior to the LMA being entered into, whether the station has been or is for sale, or whether the station was constructed while under the LMA

The LMA provided Ramar Communications, Inc. with access to the Sandia Crest antenna farm and made KASY-TV, which was an unbuilt station when the LMA was negotiated, more economically viable. Thus, the activation of a new television outlet in Albuquerque was facilitated by the LMA. This obviously served the public interest.

There are many significant efficiencies achieved by this LMA. The LMA permits consolidation of business offices for the two stations, as well as traffic, programming and engineering functions. The stations share local sports programming and public service programming.

LEVENTHAL, SENTER & LERMAN P.L.L.C.

Office of the Secretary July 8, 1997 Page 4

KASY-TV is enabled by the LMA to offer first run public affairs and news programming which would not have been economically feasible for a start-up television station without the LMA.

KASY-TV is not (and has not been) for sale.

Respectfully submitted,

LEVENTHAL SENTER & LERMAN

Bv

Dennis P. Corbett Attorneys for Ramar Communications, Inc.

REED SMITH SHAW & MCCLAY

Rv

Peter D. O'Connell

Attorneys for New Mexico Broadcasting Company, Inc.





